

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Comcast Cable Communications, LLC)	CSR 8004-E
)	
Petition for Determination of Effective)	
Competition in Nine Minnesota Franchise Areas)	

MEMORANDUM OPINION AND ORDER

Adopted: April 24, 2013

Released: April 24, 2013

By the Senior Deputy Chief, Policy Division, Media Bureau:

I. INTRODUCTION AND BACKGROUND

1. Comcast Cable Communications, LLC (“Comcast” or “the Company”), filed with the Commission a petition pursuant to Sections 76.7 and 76.907 of the Commission’s rules for a determination that Comcast is subject to effective competition in those communities listed on Attachment A and hereinafter referred to as the “Communities.”¹ Comcast alleges that its cable system serving the Communities is subject to effective competition pursuant to Section 623(l)(1)(B) of the Communications Act of 1934, as amended (“Communications Act”),² and the Commission’s implementing rules,³ and is therefore exempt from cable rate regulation in the Communities because of the competing service provided by two direct broadcast satellite (“DBS”) providers, DIRECTV, Inc. (“DIRECTV”), and DISH Network (“DISH”). An Opposition to Comcast’s petition was filed on behalf of the Communities by the Ramsey/Washington Counties Suburban Cable Communications Commission (“Ramsey/Washington”).⁴ Comcast filed a Reply.⁵ Comcast later submitted the Supplement, which was opposed by

¹ The communities originally part of Comcast’s Petition included Birchwood (MN0313), Dellwood (MN0314), Grant (MN0323), Lake Elmo (MN0315), Maplewood (MN0317), North St. Paul (MN0318), Oakdale (MN0319), Vadnais Heights (MN0320), White Bear Township (MN0324). Comcast subsequently moved to withdraw Dellwood, Maplewood, and White Bear. *See* Motion to Withdraw Dellwood, Maplewood, and White Bear From Petition for Special Relief, dated October 23, 2008 (“Motion to Withdraw”). In a Supplement dated October 9, 2012 (“Supplement”), Comcast stated it was withdrawing Birchwood. Supplement at 1 n.1.

² *See* 47 U.S.C. § 543(l)(1)(B).

³ 47 C.F.R. § 76.905(b)(2).

⁴ Opposition of the Ramsey-Washington Counties Suburban Cable Communications Commission to Comcast’s Petition for Special Relief (“Opposition”), dated Sept. 12, 2008. Ramsey/Washington is a body created pursuant to Minnesota law to regulate rates for cable service on behalf of its constituent local governments. Those governments include the nine communities named in the petition. Opposition at 1 n.1.

⁵ Reply to Opposition (“Reply”). Ramsey/Washington and Comcast each requested extensions of time, for approximately one month, in which to prepare their initial responsive pleadings herein.⁵ Each party consented to the other’s request. Motions for extension of time are not routinely granted. 47 C.F.R. § 1.46(a). The preparation of responsive pleadings herein, however, required detailed factual investigations of the extent of Comcast’s build out in one of the Communities. The complex and fact-intensive nature of these investigations justifies a month-long extension. Accordingly, we grant each party’s request for an extension of time.

Ramsey/Washington⁶ and Comcast filed a response to Ramsey/Washington's opposition to the Supplement.⁷

II. PROCEDURAL MATTERS

2. Comcast moved to withdraw from these proceedings three of the communities that are named in the petition. These are Dellwood (MN0314), Maplewood (MN0317), and White Bear Township (MN0324)).⁸ Ramsey/Washington does not object to Comcast's motion, and we grant it.

3. In addition, Comcast submitted the Supplement, which includes updated household figures from the 2010 Census and updated DBS subscriber figures.⁹ Ramsey/Washington objects to Comcast's submission of a Supplement in this proceeding, arguing that the submission of such a Supplement is procedurally improper.¹⁰ Comcast responds that the Supplement represents only a "factual update" of the record and Ramsey/Washington would not be prejudiced by the Commission's consideration of updated data.¹¹ In any event, Comcast states that it has no issue with the Commission deciding this case based on either the Supplement data or pre-Supplement data.¹² Because we find, for the reasons stated below, that the pre-Supplement data is sufficient for us to resolve this proceeding with respect to the remaining Communities, we do not rely on the Supplement's data as a basis for our decision and it is not necessary for us to determine whether it is procedurally proper for us to consider the data provided in the Supplement.

III. DISCUSSION

4. In the absence of a demonstration to the contrary, cable systems are presumed not to be subject to effective competition,¹³ as that term is defined by Section 623(l) of the Communications Act and Section 76.905 of the Commission's rules.¹⁴ The cable operator bears the burden of rebutting the presumption that effective competition does not exist with evidence that effective competition is present within the relevant franchise area.¹⁵ For the reasons set forth below, we grant the petition based on our finding that Comcast is subject to effective competition in the Communities.

5. Section 623(l)(1)(B) of the Communications Act provides that a cable operator is subject

⁶ Ramsey/Washington Opposition to Comcast's Supplement, dated January 14, 2013 ("Opposition II"). This pleading was accompanied by a Motion for Leave to File.

⁷ Comcast Response to the Opposition, dated February 7, 2013 ("Response"). This pleading was also accompanied by a Motion for Leave to File.

⁸ See Motion to Withdraw.

⁹ The Supplement also withdraws the community of Birchwood and Ramsey/Washington does not object to this withdrawal. While we do not rely on the Supplement's data to grant the petition with respect to the remaining Communities, we will withdraw Birchwood as Comcast concedes that the community is no longer subject to effective competition. See Supplement at 1. With respect to the remaining Communities, Comcast submits that either the Supplement or pre-Supplement data supports a finding of effective competition. Response at 2.

¹⁰ See Opposition II at 4-7. Ramsey/Washington also makes substantive objections to the data contained in the Supplement that largely parallel its objections discussed *infra* regarding the pre-Supplement data. See *id.* at 7-10.

¹¹ Response at 1-2.

¹² *Id.* at 2.

¹³ 47 C.F.R. § 76.906.

¹⁴ See 47 U.S.C. § 543(l)(1); 47 C.F.R. § 76.905(b).

¹⁵ See 47 C.F.R. §§ 76.906 & -907(b).

to effective competition if the franchise area is (a) served by at least two unaffiliated multi-channel video programming distributors (“MVPDs”), each of which offers comparable video programming to at least 50 percent of the households in the franchise area; and (b) the number of households subscribing to programming services offered by MVPDs other than the largest MVPD exceeds 15 percent of the households in the franchise area.¹⁶ This test is referred to as the “competing provider” test.

6. The first part of this test has three elements: the franchise area must be “served by” at least two unaffiliated MVPDs who offer “comparable programming” to at least “50 percent” of the households in the franchise area.¹⁷ It is undisputed that the Communities are “served by” both DBS providers, DIRECTV and DISH, and that these two MVPD providers are unaffiliated with Comcast or with each other. A franchise area is considered “served by” an MVPD if that MVPD’s service is both technically and actually available in the franchise area. DBS service is presumed to be technically available due to its nationwide satellite footprint, and presumed to be actually available if households in the franchise area are made reasonably aware of the service’s availability.¹⁸ The Commission has held that a party may use evidence of penetration rates in the franchise area (the second part of the competing provider test discussed below) coupled with the ubiquity of DBS services to show that consumers are reasonably aware of the availability of DBS service.¹⁹ The “comparable programming” element is met if a competing MVPD provider offers at least 12 channels of video programming, including at least one channel of nonbroadcast service programming²⁰ and is supported in this petition with copies of channel lineups for both DIRECTV and DISH.²¹ Also undisputed is Comcast’s assertion that both DIRECTV and DISH offer service to at least “50 percent” of the households in the Communities because of their national satellite footprint.²² Accordingly, we find that the first part of the competing provider test is satisfied.

7. The second part of the competing provider test, Section 623(l)(1)(B)(ii) of the Communications Act, requires that the number of households subscribing to MVPDs, other than the largest MVPD, exceeds 15 percent of the households in a franchise area. Comcast asserts that it is the largest MVPD in the Communities,²³ an assertion that Ramsey/Washington does not dispute. We see no reason to doubt Comcast’s assertion, and so we accept it. The second part of the competing provider test thus requires Comcast to calculate DBS subscribership. The numerator of this statutory ratio is the number of DBS subscribers in each Community and the denominator is the number of households there.

8. Comcast started with a list of the five-digit zip codes that covered part of one of the Communities.²⁴ Then the Company purchased a report from the Satellite Broadcasting and Communications Association (“SBCA”) that stated the number of DBS subscribers in each of those zip codes as of 2008.²⁵ Then, for each zip code, Comcast obtained from Media Business Corporation (“MBC”) an allocation stating what percent of the DBS subscribers in the entire zip code was in the part

¹⁶ 47 U.S.C. § 543(l)(1)(B); *see also* 47 C.F.R. § 76.905(b)(2).

¹⁷ 47 C.F.R. § 76.905(b)(2)(i).

¹⁸ *See* Petition at 3.

¹⁹ *Mediacom Illinois LLC*, 21 FCC Rcd 1175, 1176, ¶ 3 (2006).

²⁰ *See* 47 C.F.R. § 76.905(g). *See also* Petition at 4.

²¹ *See* Petition at 4 & Exh. 2.

²² *See id.* at 2-3.

²³ *See id.* at 5.

²⁴ No zip code was contained entirely within one of the Communities. *See* Petition at Exh. 6, col. E.

²⁵ Petition at 4-5.

of the zip code that covered a Community.²⁶ Comcast then multiplied SBCA's gross numbers by MBC's allocation percentages, producing an estimate of how many DBS subscribers there were in the part of each zip code that covered a Community. By adding those estimates for each Community, Comcast made an estimate of how many DBS subscribers there were there. Comcast then used 2000 Census data for the number of households in each Community.²⁷ All this data and the resulting ratios (DBS subscribers over households) are displayed in Attachment A. If accepted, they show that the number of households subscribing to programming services offered by MVPDs, other than the largest MVPD, exceeds 15 percent of the households in each of the Communities – in other words, that the criteria for competing provider effective competition are present in each Community.

9. Ramsey/Washington criticizes Comcast's use of five-digit zip code-based data and MBC's allocation formula to estimate the number of DBS subscribers in each Community. Ramsey/Washington argues that Comcast should have used more precise nine-digit zip code data, which removes the need for an allocation percentage.²⁸ We do not agree with Ramsey/Washington's argument. We have repeatedly accepted five-digit zip code data and an allocation percentage in effective competition proceedings, and have declined to require the use of nine-digit zip code-based data.²⁹ Ramsey/Washington has given us no reason to depart from that longstanding practice here.

10. Ramsey/Washington asked Comcast for detailed information about the facts and procedures by which MBC reached its allocation percentages for five-digit zip codes.³⁰ Comcast refused, noting the customary lack of discovery in effective competition proceedings.³¹ The Company chose to stand on the evidence it had submitted in the record, principally a one-page description of MBC's processes that is attached to the petition³² and, in Comcast's reply, a sworn statement by an MBC officer illuminating an aspect of one part of those processes.³³

11. Ramsey/Washington objects that Comcast's refusal made it "virtually impossible" for Ramsey/Washington "to recreate the methodology used by MBC."³⁴ It also states that time constraints would have made such an effort impossible even if Comcast had been forthcoming.³⁵ Ramsey/Washington finds only one specific fault with MBC's processes. That is MBC's assumption that if, for example, ten percent of a five-digit zip code's territory is in a Community, then ten percent of the DBS subscribers in that zip code are in the Community.³⁶ This assumption, Ramsey/Washington states,

²⁶ *Id.* at 5-6.

²⁷ *Id.* at 6-7 & Exh. 7.

²⁸ Opposition at 5-6.

²⁹ See, e.g., *Time Warner Cable Inc.*, 25 FCC Rcd 5457, 5461-62, ¶¶ 14-16 (2010) ("*Time Warner*"), application for review pending; Public Notice, *Commission Clarifies Standards for Evidence of Competing Provider Effective Competition for Cable Service*, 24 FCC Rcd 8198 (2009); *Bright House Networks, LLC*, 22 FCC Rcd 4390, 4394, ¶ 11 (2007).

³⁰ Opposition at Exh. 2 at 1-2.

³¹ *Id.* at 3-4.

³² Petition at Exh. 4.

³³ Reply at Exh. C.

³⁴ Opposition at Exh. 3 (Declaration of Timothy W. Finnerty in Support of Opposition to the Ramsey-Washington Counties Suburban Cable Communications Commission to Comcast's Petition for Special Relief ("Finnerty Declaration")) at ¶ 7.

³⁵ *Id.* at ¶¶ 7-8.

³⁶ Petition at 6.

will not always be accurate.³⁷

12. We do not fault Comcast for refusing Ramsey/Washington's discovery request. Recreating MBC's processes is not the only way to reveal flaws in them. Nor would we deny Ramsey/Washington enough time to form a critique of those processes; we granted Ramsey/Washington a substantial extension of time. Concerning the MBC assumption that Ramsey/Washington challenges, Ramsey/Washington does not show that the assumption is actually faulty and overstates DBS subscribership in any of the Communities. Such a showing, if true, would be easy for Ramsey/Washington to make on the present record because of its undoubted knowledge of the Communities' geography and their distribution of population. Accordingly, the only specific criticism that Ramsey/Washington makes is theoretical, and we cannot give it weight here.

13. Ramsey/Washington's discovery request is, in the last analysis, an attempt to complicate this proceeding without any prior indication of a factual error, erroneous assumption, or analytical unsoundness in MBC's processes. Requiring a more detailed description of those processes would add complexity and delay to these proceedings without any likelihood on the present record that an error would be revealed or a sounder result would occur.³⁸ Accordingly, we reject Ramsey/Washington's request for detailed information about the facts and procedures used by MBC to determine its allocation percentages for five-digit zip codes.

14. Ramsey/Washington criticizes Comcast for estimating DBS subscribership by matching 2008 DBS subscriber numbers with 2000 Census household numbers.³⁹ This criticism has no merit. We have repeatedly held that the use of a recent DBS subscriber number and a Census-derived household number from several years before, without more, will not cause us to reject a showing of effective competition.⁴⁰

15. We may reject a household number taken from the Census when we are presented with a more recent household number that has as much reliability as the Census.⁴¹ Ramsey/Washington attempted such a presentation, by advancing its own set of estimated household numbers for the Communities.⁴² These estimates originated with the Metropolitan Council, the regional planning agency serving the seven-county metropolitan area that includes the Communities.⁴³ We do not accept Ramsey/Washington's proposed numbers. First, they are merely estimates, not actual counts such as the 2000 Census. Second, although Ramsey/Washington's proposed numbers estimate "households," which is what the Communications Act calls on us to measure,⁴⁴ it is unclear whether the Metropolitan Council

³⁷ Finnerty Declaration at ¶ 10.

³⁸ See, e.g., *Marcus Cable Assoc's, LLC*, 25 FCC Rcd 4369, 4373, ¶ 10 (2010) ("*Marcus*"), denying review to 18 FCC Rcd 9649 (2003) & 17 FCC Rcd 16652 (2002); *Time Warner*, 25 FCC Rcd at 5461, ¶ 13; *Comcast Cable Commun., LLC*, 24 FCC Rcd 1780, 1785-86, ¶¶ 16-19 (2009); *Subsidiaries of Cablevision Systems Corp.*, 23 FCC Rcd 14141, 14146-47, ¶¶ 19-20 (2008) ("*Cablevision*"); *Time Warner Cable Inc.*, 23 FCC Rcd 12210, 12215, ¶ 16 (2008).

³⁹ Opposition at 4.

⁴⁰ See, e.g., *Cablevision*, 23 FCC Rcd at 14143-45, ¶¶ 9-14; *Time Warner Cable Inc.*, 25 FCC Rcd at 12214, ¶ 15; see also authorities cited *infra* note 40.

⁴¹ *Comcast Cable Commun, LLC*, Memorandum Opinion & Order DA 10-1787 at ¶ 11 (rel. Sept. 21, 2010), available at 2010 WL 3641218 (with Erratum); *Time Warner*, 25 FCC Rcd at 5463-64, ¶ 21; *Comcast Cable Commun., LLC*, 25 FCC Rcd 4967, 4971, ¶ 14 (2010).

⁴² Finnerty Declaration at ¶ 11.

⁴³ Metropolitan Council, About Us, <http://www.metrocouncil.org/about/about.htm> (visited Dec. 9, 2010).

⁴⁴ 47 U.S.C. § 543(l)(1)(B)(ii).

uses the Census Bureau's detailed definition of "household."⁴⁵ More broadly, it is unclear how the Metropolitan Council reached its estimates. Accordingly, Ramsey/Washington has not shown that its proposed estimates are as reliable as the 2000 Census counts that Comcast uses. In addition, even if we were to adopt Ramsey/Washington's estimates, and if we used Comcast's DBS subscriber numbers, DBS subscribership would exceed 15 percent in all of the Communities.⁴⁶

16. Comcast estimated DBS subscribership for the City of Grant based on its entire franchise area, which encompasses the whole City.⁴⁷ Ramsey/Washington claims that Comcast has not built its cable system to approximately one quarter of the City, and that the un-built area accounts for a disproportionately large percent of the DBS subscribers in the City.⁴⁸ Ramsey/Washington alleges that, since the beginning of cable service in 1985, the area Comcast serves "has largely remained unchanged with very limited exceptions."⁴⁹ Ramsey/Washington therefore asks us to measure DBS subscribership only in the part of the City where Comcast has actually built its cable system. There, it appears, DBS subscribership is less than the statutory minimum for competing provider effective competition.⁵⁰

17. Section 623(l)(1)(B) requires that we measure effective competition in the cable operator's franchise area,⁵¹ a term that we define as "the area a system operator is granted authority to serve in its franchise."⁵² Where, however, the cable operator has made an affirmative decision, confirmed by its own conduct, to serve less than the whole area granted in its franchise, we have held that the cable operator has re-defined its franchise area to be the lesser area and have limited our assessment of effective competition to that area. To fit within this exception, it is not sufficient for an entity opposing the petition for effective competition to rely solely upon evidence that the cable operator has not yet extended its cable system into part of a franchise area. It must show that the cable operator, through its own conduct, has self-defined the areas it will serve to exclude a particular part of its franchise area that it is required to serve.⁵³ Almost all of our decisions finding franchise area redefinition have involved a cable operator that has openly stated that it will not build in a certain area⁵⁴ and/or two cable operators that have been franchised to serve the same municipality and each clearly has no intention of overbuilding the other.⁵⁵

18. We find that Ramsey/Washington has not made the requisite showing. It has not shown

⁴⁵ U.S. Census Bureau, State & County QuickFacts, http://quickfacts.census.gov/qfd/meta/long_HSD010200.htm (visited Dec. 9, 2010). It is not clear, for example, whether Ramsey/Washington excluded from its estimate of households housing units that do not qualify as households, such as unoccupied housing units, nursing homes, and dormitories. See, e.g., *Marcus*, 25 FCC Rcd at 4372, ¶ 9; *CoxCom, Inc.*, 22 FCC Rcd 4533, 4538, ¶ 13 (2007).

⁴⁶ Finnerty Declaration at Exh. B.

⁴⁷ Reply at 6 & Exh. A (Cable Television Franchise Ordinance) at § 8.

⁴⁸ Opposition at 7-8; Finnerty Declaration at ¶ 12.

⁴⁹ Opposition at 7; Finnerty Declaration at ¶ 12.

⁵⁰ Opposition at 7.

⁵¹ 47 U.S.C. § 543(l)(1)(B) speaks three times of a "franchise area."

⁵² *Implementation of Sections of the Cable Television Consumer Protection & Competition Act of 1992: Rate Regulation ("First Reconsideration")*, 9 FCC Rcd 1164, 1180, ¶ 24 (1993).

⁵³ *First Reconsideration*, 9 FCC Rcd at 1181, ¶ 25; *Mediacom Southeast LLC*, 23 FCC Rcd 9964, 9966, ¶ 6 (2008).

⁵⁴ *County of New Hanover, North Carolina*, Memorandum Opinion & Order DA 08-2344 at ¶¶ 9-10 (rel. Oct. 24, 2008), available at 2008 WL 4693164; *Comcast of Greater Florida/Georgia, Inc.*, 22 FCC Rcd 4588, 4950, ¶ 6 (2007); *Cecilton CATV, Inc.*, 10 FCC Rcd 2937, 2939, ¶ 11 (1995).

⁵⁵ *Century Cable of Northern California Inc.*, 13 FCC Rcd 24153, 24161-62, ¶¶ 21-22 (1998), *reconsideration denied*, 14 FCC Rcd 18604 (1999).

that either of the two scenarios described in the preceding paragraph exist here. All it has shown is that Comcast has not built its cable system out to serve the full area that it was granted authority in its franchise to serve. Such a showing, without more, is insufficient to establish that the cable operator has redefined its service area.⁵⁶ Indeed, here Comcast has shown that it has expanded its system in recent years in accordance with the build-out obligations of its franchise agreement with the City. Comcast states that it will continue to expand as indicated by demand and required by its agreement.⁵⁷ Ramsey/Washington has not established that Comcast has made an affirmative decision, confirmed by its own conduct, to serve less than the whole area granted in its franchise. Accordingly, we will measure DBS subscribership in the area granted in Comcast's franchise, which is the entire City of Grant.

19. Ramsey/Washington proposes that we consider several issues other than DBS subscribership in the Communities. These issues are: (1) the degree to which DBS service does or does not restrain prices for cable service and whether the public interest would be served by the elimination of price regulation in the Communities; (2) the elimination of the requirement of uniform pricing; and (3) the possibility of Comcast beginning to require that its subscribers buy non-basic tiers if they wish to purchase certain other programming (such as pay-per-view).⁵⁸ Ramsey/Washington's premise for this proposal is that Section 76.7(a)(4)(i) of the Commission's rules requires that petitions for special relief about MVPD services "state fully and precisely all pertinent facts and considerations relied on . . . to support a determination that a grant of such relief would serve the public interest."⁵⁹

20. We decline to consider Ramsey/Washington's proposed criteria, as we have declined to consider several similar proposals. In brief, the words "public interest" are contained in section 76.7(a)(4), which sets forth the general pleading requirements applicable to numerous Commission proceedings, including effective competition determinations. We note that Congress provided the Commission with expressly crafted tests for determining effective competition that do not instruct the Commission to take into account the public interest in determining the existence or non-existence of effective competition. None of Ramsey/Washington's suggested public interest issues are mentioned in the pertinent statutory provisions or the rules as implemented by the Commission. There is no statutory basis to delay basic rate deregulation in a franchise area until the arrival of perfect competition there and the resolution of all issues between a cable operator and a franchise authority to the latter's satisfaction. Accordingly, we reject Ramsey/Washington's policy-based objections to Comcast's evidence concerning the second part of the competing provider test.

21. We find that Comcast has demonstrated that the number of households subscribing to programming services offered by MVPDs, other than the largest MVPD, exceeds 15 percent of the households in each of the Communities. Therefore, the second prong of the competing provider test is satisfied for each of the Communities. We conclude that Comcast has submitted sufficient evidence demonstrating that both parts of the competing provider test are satisfied and Comcast is subject to effective competition in the Communities listed on Attachment A.

⁵⁶ See, e.g., *Valley Center Cablesystems, L.P.*, 10 FCC Rcd 11940, 11945, ¶ 11 (1995); *Atlantic Broadband (Penn) LLC*, 22 FCC Rcd 4668, 4671, ¶ 7 (2007); *Cablevision of Paterson*, 17 FCC Rcd 17239, 17241, ¶ 4 (2002).

⁵⁷ Reply at Exh. B (Declaration of Kathi Donnelly-Cohen, Comcast Director of Government Affairs in the Twin Cities Region) at ¶¶ 3-5.

⁵⁸ Opposition at 9-11.

⁵⁹ *Id.* at 8, citing 47 C.F.R. § 76.7(a)(4).

IV. ORDERING CLAUSES

22. Accordingly, **IT IS ORDERED** that the petition for a determination of effective competition filed in the captioned proceeding by Comcast Cable Communications, LLC, **IS GRANTED**.

23. **IT IS FURTHER ORDERED** that the certification to regulate basic cable service rates granted to any of the Communities set forth on Attachment A **IS REVOKED**.

24. This action is taken pursuant to delegated authority pursuant to Section 0.283 of the Commission's rules.⁶⁰

FEDERAL COMMUNICATIONS COMMISSION

Steven A. Broecker
Senior Deputy Chief, Policy Division, Media Bureau

⁶⁰ 47 C.F.R. § 0.283.

ATTACHMENT A

CSR 8004-E

COMMUNITIES SERVED BY COMCAST CABLE COMMUNICATIONS, LLC

Communities	CUIDs	CPR*	2000 Census Households	Estimated DBS Subscribers
City of Grant	MN0323	24.82%	1374	341
City of Lake Elmo	MN0315	26.71%	2347	627
City of North St. Paul	MN0318	16.88%	4703	794
City of Oakdale	MN0319	19.06%	10243	1952
City of Vadnais Heights	MN0320	17.46%	5064	884

*CPR = Percent of competitive DBS penetration rate.